

August 31, 2016

Regarding RM 11708

To the attention of:

Federal Communications Commission

Rick Roderick: President, ARRL

Tom Gallagher: CEO, ARRL

Brennan Price: CTO, ARRL

David Woolweaver: Director, West Gulf Division, ARRL

Received & Inspected

SEP 7 - 2016

FCC Mail Room

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My comments to the proposed rule-making are based both on nearly sixty years as an active radio amateur, as well as a professional career in the semiconductor industry, which was capped as Corporate V.P. of Motorola and Director of Wireless Strategy for the Semiconductor Sector. In the latter, I was the principle liaison with the cell phone industry in general and specifically with Motorola's Personal Communications Sector, the "smart phone" branch of the company, between 2008 and 2012.

One thing that became clear to me was that digital communications modes provided nearly unlimited promise for technical innovation, especially when coupled with the creation of applications written by independent groups. As a general rule, the requirements of digital communications protocols demand more throughput, since the richness of the user experience is based on this fundamental capability. Or stated another way, if and when digital protocols are allowed into a frequency range, they usually will expand to take full advantage of the capability of the frequencies allocated. Bluntly stated, to allow digital communications inside the historically analog Morse code and Radio Teletype band-sections, with no limitation on the bandwidth or throughput, will ensure that the developments will stress the older technology and sans any limitations, will obliterate the traditional methods at some point.

As I understand it, RM11708 eliminates both the bandwidth and the throughput cap on digital signals, or at least limits the bandwidth to a quite broad limit. This combination likely is the death knell, over a decade or more, of the traditional analog modes in my opinion. The hobby we love so much is a combination of both technical innovation as well as a series of "killer apps" that attract users. As examples of Morse code-based attractions; low power transceivers have flowered along with Morse-based specialties including Summits-On-The-Air, National-Parks-On-The-Air, Islands-On-The-Air, etc. In general, CW-based activities that can be based on low power and light weight transport are some of the most popular elements of ham radio.

As a life-long radio enthusiast, who in the last fifteen years or so has operated only CW, I am concerned that the ARRL would endorse such a proposal, and that the FCC would consider it for rule-making. Please take this off the agenda and reconsider the threats to the traditional analog modes of the hobby.

Sincerely,

A handwritten signature in black ink, reading "James K. George, Jr." with a stylized flourish at the end.

James K. George, Jr, N3BB

Life Member, ARRL

Author, "Contact Sport," and "Reunion"